

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

OAKFABCO, INC.,

Debtor.

Chapter 11

Case No. 15-27062

Hon. Jack B. Schmetterer

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on Monday, September 21, 2015 at 10:30 a.m. or as soon thereafter as counsel may be heard, we shall appear before the Honorable Jack B. Schmetterer in Courtroom 682 at the United States Bankruptcy Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, Illinois, or before any other judge who may be sitting in his place and stead, and present the Debtor's Motion for an Order: (i) Approving the Assumption of a Settlement Agreement and Release Between Oakfabco, Inc. and New England Reinsurance Company; (ii) Approving the Sale of Certain Insurance Policies to New England Reinsurance Company; and (iii) Issuing an Injunction In Favor of New England Reinsurance Company and Certain Others Pursuant to the Sale of Certain Insurance Policies [Docket No. 67] for a preliminary hearing, at which time a final hearing will be set, upon notice and an opportunity to object. You may appear at the hearing if you so desire.

Dated: September 15, 2015  
Chicago, Illinois

Respectfully submitted,

REED SMITH LLP

By: /s/ Stephen T. Bobo  
Stephen T. Bobo  
10 S. Wacker Drive  
Suite 4000  
Chicago, IL 60606  
Telephone: (312) 207-1000  
Facsimile: (312) 207-6400

*Proposed Counsel to Debtor and Debtor In  
Possession*

**CERTIFICATE OF SERVICE**

I, Stephen T. Bobo certify that, on September 15, 2015, I filed a copy of the foregoing **Notice of Motion** (relating to the Debtor's Motion for an Order: (i) Approving the Assumption of a Settlement Agreement and Release Between Oakfabco, Inc. and New England Reinsurance Company; (ii) Approving the Sale of Certain Insurance Policies to New England Reinsurance Company; and (iii) Issuing an Injunction In Favor of New England Reinsurance Company and Certain Others Pursuant to the Sale of Certain Insurance Policies [Docket No. 67] (the "Motion") using this Court's CM/ECF system, and served all parties consenting to receive electronic service by operation of the CM/ECF. Further, on September 15, 2015, I caused a copy of the Notice of Motion and Motion to be served through Logan & Company, the appointed Notice and Servicing agent to the Debtor, upon the parties identified below, via First Class Mail.

/s/ Stephen T. Bobo

Stephen T. Bobo

SERVICE LIST

Page 1 of 1

**DEBTOR: OAKFABCO, INC.**

**CASE NO: 15-27062 (JBS)**

**First Class Mail**

Creditor ID: 33-99  
DAVID CHRISTIAN ATTORNEYS LLC  
COUNSEL TO CNA  
DAVID CHRISTIAN, ESQ  
3515 WEST 75TH ST, STE 208  
PRAIRIE VILLAGE KS 66208

**First Class Mail**

Creditor ID: 30-99  
DENTONS US LLP  
COUNSEL TO AFFILIATED FM INSURANCE COMPANY  
ROBERT B. MILLNER, ESQ  
GEOFFREY M. MILLER, ESQ  
233 S WACKER DR, STE 5900  
CHICAGO IL 60606

**First Class Mail**

Creditor ID: 34-99  
FRANKGECKER LLP  
COUNSEL TO ASBESTOS CLAIMANTS' COMMITTEE  
JOSEPH D. FRANK, ESQ  
FRANCES GECKER, ESQ & MICAH R. KROHN, ESQ  
325 N LASALLE ST, STE 625  
CHICAGO IL 60654

**First Class Mail**

Creditor ID: 29-99  
HINSHAW & CULBERTSON LLP  
COUNSEL TO AFFILIATED FM INSURANCE COMPANY  
SCOTT M. SEAMAN, ESQ  
222 NORTH LASALLE ST, STE 300  
CHICAGO IL 60601

**First Class Mail**

Creditor ID: 31-99  
KARBAL COHEN ECONOMOU SILK AND DUNNE LLC  
COUNSEL TO NEW ENGLAND REINSURANCE COMPANY  
WAYNE S. KARBAL, ESQ  
PAUL PARKER, ESQ  
150 S WACKER DR, STE 1700  
CHICAGO IL 60606

**First Class Mail**

Creditor ID: 40-99  
NAPOLI BERN RIPKA SHKOLNIK & ASSOC. LLP  
PARTICK N. HAINES, ESQ  
103 WEST VANDALIA ST  
EDWARDSVILLE IL 62025

**First Class Mail**

Creditor ID: 22-92  
OAKFABCO, INC.  
1 LINCOLN CENTER, STE 1100  
OAKBROOK TERRACE IL 60181

**First Class Mail**

Creditor ID: 1-99  
OFFICE OF THE US TRUSTEE, REGION 11  
STEPHEN G WOLFE, ESQ  
ATTORNEY FOR THE US TRUSTEE  
219 S DEARBORN ST, RM 873  
CHICAGO IL 60604

**First Class Mail**

Creditor ID: 35-99  
WILMER CUTLER PICKERING HALE AND DORR LLP  
COUNSEL TO NEW ENGLAND REINSURANCE COMPANY  
CRAIG GOLDBLATT, ESQ  
NANCY L. MANZER, ESQ  
1875 PENNSYLVANIA AVE NW  
WASHINGTON DC 20006

**Total: 9**